

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Case Action No.: 21-CV-05730- AMD-RML

DISH NETWORK, LLC,

Plaintiff,

-Against-

ANSWER

786 WIRELESS WORLD, INC., 786
ENTERPRISES, INC., ADEEL HUSSAIN (aka
ADIL HUSAIN), RANA M. AFZAL,
SUSHMA SHARMA (aka SUDHMA
SHARMA), RAJESH VAIDYA (aka OMER
MASSOD), SATBIR GIRN, RAJBIR GIRN,
RAJKIRAN SINGH (aka SAJAN SINGH),
KHIZER FAROOQ, and DOE DEFENDANTS
1-10

Defendant(s).

The defendants 786 Wireless World, Inc., 786 Enterprises, Inc., Adeel Hussain and Rana M. Afzal by and through its attorney, David H. Perlman, as and for its Answer to the Complaint of the Plaintiff in this action, respectfully set forth and allege as follows, upon information and belief, based upon the files maintained in our office.

1. Denies knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraphs “1”, “2”, “3”, “4”, “8”, “9”, “10”, “11”, “12”, “16”, “17”, “18”, “19”, “24”, “25”, “26”, “27”, “28”, “29”, “30”, “31”, “32”, “33”, “34”, “35”, “36”, “38”, “41”, “42”, “43”, “44”, “45”, “46”, “47”, “48”, “49”, “50”, “51”, “55”, “56”, “57”, “58”, “59”, “60”, “61”, “62”, “63”, “65”, “68” and “69” of the complaint.

2. Denies the allegations contained in paragraphs “5”, “6”, “7”, “13”, “14”, “27”, “37”, “39”, “40”, “52”, “53”, “66”, “67”, “70”, “71”, “72”, “73”, “74”, “76”, “77” and “78”.

3. Denies “10” except admits resides in Brooklyn, denies “13” except admits New York Corporation.

AFFIRMATIVE AND OTHER DEFENSES

The Defendant asserts the following affirmative and other defenses without assuming any burden of production or proof that they would not otherwise have. The Defendant further asserts that, to the extent that the Plaintiff's claims as alleged are vague or unclear, so as to render it difficult or impossible to identify and assert every possible affirmative or other defense, the Defendant hereby expressly reserves its rights to assert additional defenses should further proceedings in this action, including the progress of any discovery, reveal that such additional defenses.

AS AND FOR A FIRST DEFENSE TO THE PLAINTIFF'S COMPLAINT

The statements and allegations contained in the Plaintiff's Complaint may fail to state any valid cause(s) of action upon which relief can be granted as a matter of fact and/or law, including that the plaintiff may lack standing to bring the complaint.

AS AND FOR A SECOND DEFENSE TO THE PLAINTIFF'S COMPLAINT

The Defendant states, in the alternative if necessary, that any actions or omissions with respect to the Plaintiff were taken in good faith, with reasonable belief that such conduct comported with the requirements of federal and state law.

AS AND FOR A THIRD DEFENSE TO THE PLAINTIFF'S COMPLAINT

The Defendant states, in the alternative if necessary, that it may be found to have violated any law regulation, that any such violation was not willful.

RESERVATION OF RIGHTS TO ASSERT ADDITIONAL DEFENSES

The Defendant states that it currently has insufficient knowledge or information on which to form a belief as to whether they may have additional, as yet unstated, defenses available. As

such, the defendant expressly reserves the right to assert additional defenses, and to seek to amend this Answer to include any such additional defenses, in the event that discovery indicates that any such additional defenses would be appropriate.

WHEREFORE, defendants, 786 Wireless World, Inc., 786 Enterprises, Inc., and Rana M. Afzal, demand judgment in their favor, dismissal of the complaint, interest, costs and disbursements and such other and further relief as the court deems just and proper.

Dated: November 28, 2022

Respectfully submitted,

/s/ David H. Perlman /s/
David H. Perlman (DHP0607)
Attorney for Defendants
188 Montague Street, Ste. 850
Brooklyn, NY 11201
Tel: 718-855-8708
Email: David@dhperlman.com

TO: Robert D. Balin
Adam I. Rich
Davis Wright Tremaine LLP
1251 Avenue of the Americas
21st Floor
New York, NY 10020